



Ace Computers

EPEAT 4.10.1.2 Socially Responsible Manufacturing: OHS
Audit Methodology & Results Report
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FORWARD

Ace Computers has completed the following “Supplier OHS Audit” in compliance with EPEAT Criteria for “4.10.1.2 Optional—Socially responsible manufacturing: OHS.”

Guidance for carrying out this risk assessment to identify and analyze risks associated with supplier relationships follows the above EPEAT criteria documentation as set out in: IEEE Standard for Environmental and Social Responsibility Assessment of Computers and Displays, Amendment 1: Editorial and Technical Corrections and Clarifications.

Section 1 gives a brief introduction to the purpose and defining aspects of the audit.

Section 2 gives a brief introduction to the methodology, key concepts and tools and discusses its main features.

Section 3 gives a summary of the results of the audit.

SECTION 1: Risk Assessment Background

Ace Computers participates in the online Registry of products covered under the EPEAT ecolabel. The EPEAT ecolabel is the leading global Type-1 ecolabel for these technology products. The Global Electronics Council (GEC) manages the EPEAT ecolabel, including the Conformity Assurance Bodies that provide 3rd party verification of the products listed in this Registry. Products must meet certain required and optional EPEAT criteria to be considered "EPEAT-registered" and be listed on this site. The specific EPEAT tier achieved by a product aligns with the number of optional criteria the product meets.

1.1: Purpose of Risk Assessment

Ace Computers is applying for the optional criteria "4.10.1.2 Optional—Socially responsible manufacturing: OHS." Under these criteria there are requirements and guidance that must be followed and met for determining supplier scope and compliance in the categories of Occupational Health and Safety (OHS).

1.2: Defining Risk and Risk Assessment

Risk is defined and must be assessed in the OHS category. EPEAT sets out guidance for which Ace Computers has determined their risk parameters and completed the assessment. To meet EPEAT criteria 4.10.1.2, Ace must assess its suppliers to determine those facilities that are In-scope or Out-of-scope. Out-of-scope facilities are those facilities that are reasonably above the threshold of risk for OHS violations, and as such require no further action or corrective action. In-scope facilities include the manufacturer or are those directly contracted suppliers that fall below the thresholds of acceptable risk for OHS violations and require verification of certifications that prove the facility has acquired management systems that reduce potential risks that were identified during the auditing process.

Before EPEAT's Conformity Assurance Body can verify that Ace Computers has demonstrated conformance with the criteria, Ace must prove that the guidelines for each of the categories have been met. To meet the guidelines Ace Computers first established a scoping tool to achieve scoping parameters. Then they demonstrated the scope of identified facilities by gathering data. Next, they developed and issued Supplier Self-Assessment Surveys. Once this process was complete Ace reviewed the data to analyze and determine if a facility was In-scope or Out-of-scope. This process determined whether the data could be turned over to the Conformity Assurance Body, or if additional conformance data was needed. Finally, after discussions with Conformity Assurance Body, and upon their determination that ACE has met all necessary verification requirements, Ace can be awarded EPEAT Conformance, and the criteria can be added to Ace Computer's EPEAT Registry. Below is a summary of the definitions, requirements, and verifications to be set in demonstrating conformity with EPEAT.

DEFINITIONS

OHS

Acceptable risk, risk, and risk assessment as defined in OHSAS 18001, def 3.21

Requirements

Requirements for Facilities in Scope: The manufacturer shall demonstrate that each facility in scope (based on the prioritization assessment of the relevant percentages in Table 20) meets one, or a combination, of the following:

- a) Has achieved and maintained certification by a third-party-accredited certification body (CB) to either (certification shall be no older than three years):
 - 1) OHSAS 18001, or
 - 2) ISO 45001
- b) Is RBA Validated Audit Process (VAP) recognized addressing all topics defined in Part A, or
- c) Is included in an audit program that covers the major categories listed in Part A and that meets both of the following requirements:
 - 1) Requires full audits to be performed every two years by one of the following: i) An OHSAS 18001 or ISO 45001 Certified Lead Auditor ii) An RBA Lead Auditor
 - 2) Includes corrective action identification and resolution

The manufacturer shall make an annual public disclosure of a summary of audit results (including those done via certification), including the following: ☐ The number of facilities audited; ☐ The aggregate number and total percentage of nonconformities and percentage of completion of corrective actions for each major category [as listed in a) through g) of Part A] by country (if > 5 directly contracted suppliers in a country) or by geographic area (if ≤ 5 directly contracted suppliers in a country). ☐ The aggregate number and total percentage of repeat nonconformities (as compared to the prior full audit, as applicable) for each major category [as listed in a) through g) of Part A] by country (if > 5 directly contracted suppliers in a country) or by geographic area (if ≤ 5 directly contracted suppliers in a country).

Verifications

Upon completion of the scoping process, Ace Computers then had to verify the outcome of their audit. Verifications to obtain 4.10.1.2 Criteria Conformance are listed below. Verification is a multistep process and it should be noted that some of the steps were not required for Out-of-scope facilities. Some additional verifications were required only if a facility was found to be In-scope. To that end, please note that unnecessary verification steps were not included as part of the audit process or results.

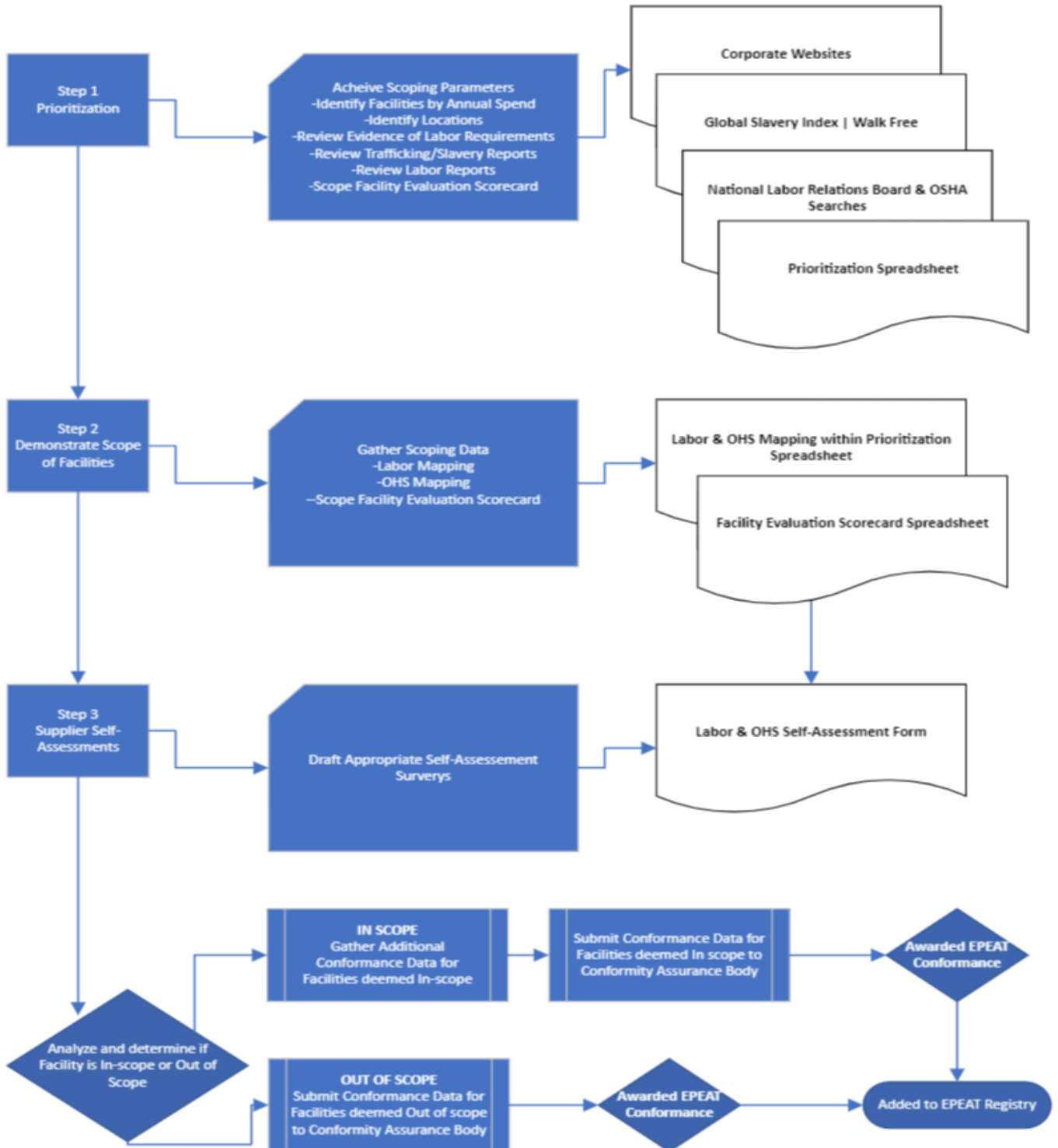
OHS

- a) URL(s) on the manufacturer website for the supplier requirements document(s) (e.g., manufacturer supplier code of conduct)
- b) Demonstration of how each of the OHS management system topics maps to the Manufacturer's supplier requirements document(s).
- c) Demonstration that the supplier requirements document(s) is incorporated into agreements with directly contracted suppliers (e.g., contracts, specifications, purchase order, or other documented requirements).
- d) Demonstration of:
 - 1) How the manufacturer determined the percentages in Table 20.

- 2) How manufacturer defined geographic area.
- 3) The methodology for evaluating supplier prioritization and how it was validated during the most recent prioritization evaluation.
- 4) If not using OHSAS 18001, ISO 45001, or RBA VAP, demonstration of how the audit maps to each major category listed in Part A.
- e) Demonstration that all manufacturing facilities in scope hold valid OHSAS 18001 or ISO 45001 certificates, have RBA VAP recognition, or are included in a supplier audit program described above.
- f) If using OHSAS 18001 or ISO 45001 certification to meet the requirements for Part B, demonstration that certification was achieved by an accredited certification body accredited (e.g., UKAS, ANAB) to audit to OHSAS 18001 or ISO 45001 upon its publication.
- g) If using a supplier audit program to meet the requirements for Part B, demonstration of the following:
 - 1) The auditing program evaluates OHS topics of this criterion and incorporates corrective action identification and resolution.
 - 2) Certificate or other credential demonstrating qualification of the auditor(s).
- h) URL for the annual public disclosure of audit results.

SECTION 2: Methodology

2.1: Audit Diagram



2.2: Risk Identification

Our EPEAT Conformity Assurance Body issued guidance to devise a tool to determine if the manufacturer/supplier facility was in-scope or out-of-scope. To qualify as out-of-scope, the frequency and likelihood of a violation by a facility of its legal obligations had to be within an acceptable risk level. [See definition of Acceptable Risk]. If a facility has anything lower than acceptable risk, they are in-scope and must meet additional “requirements for facilities in scope.”

2.3: Risk Analysis

Ace Computers started their risk analysis by issuing a prioritization. The first step in our audit process was prioritization based on several parameters to determine if a facility was in or out of scope. Ace looked at annual spend to determine which facilities drive our business. Next, we identified the geographic location of the main corporate headquarters and supplier facilities. Once facilities were determined, each facility was examined to establish if they have a Code of Conduct in place with OHS requirements and if OSHA complaints had been issued. A facility was prioritized as being above acceptable risk, and therefore out-of-scope if they had a Code of Conduct covering OHS requirements and had no OSHA complaints for fiscal year 2023 to date.

Ace then moved to a second step of analysis to demonstrate the scope of the facility based on mapping and our company’s own evaluation scorecard of supplier’s risk. OHS mapping requirements for Suppliers were mapped either based on an internet verified ISO 45001 certification or a Code of Conduct mapped against EPEATS general OHS requirements (listed on pages 3-4), Verifications, OHS, section d, 4. In addition, an evaluation scorecard was created to evaluate mapping data, if and where a completed ISO 45001 could not be found and verified online. The reasoning behind this is that the ISO 45001 certification was an absolute acceptance of achieving this OHS acceptable risk rating, however, in its absence, the scorecard could be used to determine a weighted measure of risk depending on how robust the Code of Conducts descriptions were determined to be. Facilities with evaluation scorecard ratings having a performance rating of 88 or higher were determined to be above acceptable risk and thus prioritized as out-of-scope. Facilities that scored 87 or lower on the performance rating were determined to be below acceptable risk and prioritized as in-scope.

The third and final step of analysis was to issue supplier self-assessments. These self-assessment questions were devised using the following criteria from EPEAT: (OHS) Management Systems, as well as Ace’s addition of an OHS: Prioritization Assessment Tool. A copy of the Self-Assessment Scorecard is attached for examination

With the exception of the manufacturer, who is considered automatically in-scope per EPEAT, the above three steps of prioritization were completed, the facilities were determined to be within acceptable risk, deemed out-of-scope and sent to EPEAT for a conformity review by the Conformity Assurance Body to be awarded EPEAT Conformance. At this point Ace would be allowed to add this criterion to our EPAT registry. However, if a facility was deemed to be in-scope, the facility and their information was sent to the Conformity Assurance Body to review additional data and information that would meet their requirements for the facility to earn assurance and be awarded EPEAT conformance. Again, at this point, Ace would be allowed to add this criterion to the EPEAT registry.

SECTION 3: Results

3.1: Audit Results OHS

The manufacturer is not at-risk from assessment, however, per EPEAT 4.10.1.1. all manufacturers are automatically in-scope for purposes of conformance consideration. All supplier facilities were determined to be out-of-scope for step one of the risk assessments. There were no risks below acceptable for Code of Conduct or OSHA.

OHS Prioritization:

Scoping Prioritization							
Name of Distributor	Annual Spend	Evidence of OHS Requirements (Lack of documentation is in scope)	ACE Assessment OHS Requirements (Y/N)	OSHA Complaints	Supplier Self-Assessment Completed	Risk Assessment Score In-scope = 87 or less score in Performance Expectations. Out-of-scope = 88 or higher score in Performance Expectations.	In or Out of Scope
ACE Howard - Manufacturer	NA	Supplier Code of Conduct (RBA Guided)	Y	None	Y	111	Automotically In-scope
Supplier A	43%	HR Manual	Y	None	Y	100	Out-of-scope
Supplier B	53%	RBA Guided Supplier Code of Conduct	Y	Referral, no violation	Y	115	Out-of-scope
Supplier C	4%	Global Human Rights Policy	Y	None	Y	106	Out-of-scope

OHS Mapping:

Manufacturer/Supplier	OHS Management Systems						
	A	B	C	D	E	F	G
	OHS management system describing context of the organization.	Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities, and Authorities.	Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them.	Provision of resources competence and awareness, information and communication and documented information.	Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.	Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review.	Incidents, nonconformities and corrective action, continual improvement of objectives and processes.
ACE Howard - Manufacturer	EPEAT A= E Management Systems generally and 1) Company Commitment	EPEAT B= E Management Systems generally and 2) Management Accountability and Responsibility	EPEAT C= E Management Systems generally and 4) Risk and Hazard Identification and Assessment and Risk Management	EPEAT D= E Management Systems generally and 5) Improvement Objectives, 6) Training, 7) Communication, 8) Worker Feedback, Participation & Grievance, 11) Documentation & Records	EPEAT E= E Management Systems generally and 2) Management Accountability and Responsibility, 4) Risk and Hazard Identification and Assessment and Risk Management, 5) Improvement objectives, 7) Communication, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	EPEAT F= E Management Systems generally and 2) Management Accountability and Responsibility, 5) Improvement Objectives, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	EPEAT G= E Management Systems generally and 5) Improvement Objectives, 10) Corrective Action Process, 11) Documentation and Records
Supplier A	EPEAT A=2.0 Introductory Language & Policy	EPEAT B=5.0 Performance Discipline, Layoff, & Termination	EPEAT C=8.0 Safety & Loss Prevention	EPEAT D=6.0 General Policies	EPEAT E=6.0 General Policies and 8.0 Safety & Loss Prevention	EPEAT F= 3.0 Hiring and Orientation Policies and 5.0 Performance Discipline, Layoff, & Termination	EPEAT G=8.0 Safety & Loss Prevention
Supplier B	Supplier uses same RBA that reflects ACES. E Management Systems generally and 1) Company Commitment =EPEAT A	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility = EPEAT B	Supplier uses same RBA that reflects ACES. E Management Systems generally and 4) Risk and Hazard Identification and Assessment and Risk Management = EPEAT C	Supplier uses same RBA that reflects ACES. E Management Systems generally and 5) Improvement Objectives, 6) Training, 7) Communication, 8) Worker Feedback, Participation & Grievance, 11) Documentation & Records = EPEAT D	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility, 4) Risk and Hazard Identification and Assessment and Risk Management, 5) Improvement objectives, 7) Communication, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records = EPEAT H	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility, 5) Improvement Objectives, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records = EPEAT F	Supplier uses same RBA that reflects ACES. E Management Systems generally and 5) Improvement Objectives, 10) Corrective Action Process, 11) Documentation and Records = EPEAT G
Supplier C	Global Human Rights Policy (Under: Reporting) Reflects Aces COC, E Management Systems generally and 1) Company Commitment = EPEAT A	No Section alignment could be found.	Under: Health and Safety standards Reflects Aces COC, E Management Systems generally and 4) Risk and Hazard Identification and Assessment and Risk Management = EPEAT C	Under: Education and Reporting standards Reflects Aces COC, E Management Systems generally and 5) Improvement Objectives, 6) Training, 7) Communication, 8) Worker Feedback, Participation & Grievance, 11) Documentation & Records = EPEAT D	Under: Due Dilligence standards Reflects Aces COC, E Management Systems generally and 2) Management Accountability and Responsibility, 4) Risk and Hazard Identification and Assessment and Risk Management, 5) Improvement objectives, 7) Communication, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records = EPEAT H	Under: Due Dilligence standards Reflects Aces COC, E Management Systems generally and 2) Management Accountability and Responsibility, 5) Improvement Objectives, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records = EPEAT F	Under: Due Dilligence standards reflects Aces COC, E Management Systems generally and 5) Improvement Objectives, 10) Corrective Action Process, 11) Documentation and Records = EPEAT G

3.2: Audit Scorecards

SCORE KEY	
5	Very Good: Exceeds expectations
4	Good: Meets expectations
3	Standard: Meets most expectations
2	Adequate: Meets some expectations
1	Unsatisfactory: Misses most expectations
0	Substandard: Falls far below expectations

Performance Expectations in BLUE are required.
 Performance Expectations in White are optional.

In-scope = 87 or less score in Performance Expectations. Corrective Action Requested.
 Out-of-scope = 88 or higher score in Performance Expectations.

EVALUATION AUDIT SCORE BY ACE Computers					POST SELF-ASSESSMENT AUDIT SCORE				
Supplier A	Supplier B	Supplier C	Manufacturer Ace Computers	Evaluation Category	Performance Expectations	Supplier A	Supplier B	Supplier C	Manufacturer Ace Computers
5	5	5	5	Labor: International Labor Standards Supported	Freedom of association and collective bargaining (C. 87 and C. 98)	5	5	5	5
5	5	5	5		Forced labor (C. 29 and C. 105)	5	5	5	5
5	5	5	5		Child labor and the worst forms of child labor (C. 138 and C. 182)	5	5	5	5
5	5	5	5		Discrimination (employment and occupation) (C. 111)	5	5	5	5
20	20	20	20	Labor: International Labor Standards Supported TOTAL SCORE		20	20	20	20
5	5	5	5	Labor: Domestic law in the legal jurisdiction regulating	Minimum wages	5	5	5	5
5	5	5	5		Working hours	5	5	5	5
5	5	5	5		Overtime compensation	5	5	5	5
5	5	5	5		Employment contractual relationships	5	5	5	5
20	20	20	20	Labor: Domestic law in the legal jurisdiction regulating TOTAL SCORE		20	20	20	20
5	4	4	4	Labor: Human trafficking	Policies to Prevent Trafficking in Persons Especially Women and Children	5	5	5	4
5	4	4	4		Policies to Suppress Trafficking in Persons Especially Women and Children	5	5	5	4
3	2	1	3		Policies to Punish Trafficking in Persons Especially Women and Children	3	5	1	3
13	10	9	11	Labor: Human trafficking TOTAL SCORE		13	15	11	11
5	5	5	5	Labor: Prioritization Assessment Tool	Risk Assessment Mapping	5	5	5	5
5	5	5	5		Self-identification by the supplier of risk	5	5	5	5
0	0	0	0		SA 8000	0	0	0	0
0	0	0	0		RBA Validated Audit Process (VAP)	0	0	0	0
10	10	10	10	Labor: Prioritization Assessment Tool TOTAL SCORE		10	10	10	10
4	3	3	5	(OHS) Management Systems	OHS management system describing context of the organization.	5	5	5	5
4	3	3	5		Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities, and Authorities.	5	5	5	5
3	3	3	5		Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them.	5	5	5	5
5	3	3	5		Provision of resources competence and awareness, information and communication and documented information.	5	5	5	5
3	3	3	5		Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.	1	5	5	5
4	3	3	5		Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review.	5	5	5	5
3	3	3	5		Incidents, nonconformities and corrective action, continual improvement of objectives and processes.	1	5	5	5
26	21	21	35		SCHEDULE TOTAL SCORE		27	35	35
5	5	5	5	OHS: Prioritization Assessment Tool	Risk Assessment Mapping	5	5	5	5
5	5	5	5		Self-identification by the supplier of risk	5	5	5	5
0	0	0	0		OHSAS 18001 Audit Results	0	0	0	0
0	0	0	0		ISO 45001 Audit Results	0	5	0	5
0	0	0	0	RBA Validated Audit Process (VAP)	0	0	0	0	
10	10	10	15	HEALTH & SAFETY TOTAL SCORE		10	15	10	15
99	91	90	111	TOTAL SCORE		100	115	106	111

"Risk Assessment Score In-scope = 87 or less score in Performance Expectations.
 Out-of-scope = 88 or higher score in Performance Expectations."

3.3: General Audit Results

Of the three suppliers issued self-assessments, all three returned their assessments for a return rate of 100%. Any additional information or documentation was reviewed for inconsistencies. Each self-assessment was compared to the scorecard evaluation to make sure it was in line. If something was inconsistent, the evaluation scorecard was marked accordingly.

Final Analysis and Determination

Once all prioritization documentation was received and a thorough review was completed. Four total facilities were audited (Manufacturer-Ace Computers, Supplier A, Supplier B, and Supplier C). The audit covered ≤ 5 directly contracted suppliers in a country. The aggregate number and total percentage of nonconformities and repeat non-conformities and percentage of completion of corrective actions for each major category was determined by geographic area. ACE determined that only the manufacturer facility, ACE Computers, fell in-scope. All other facilities were out-of-scope and documentation was submitted to the Conformity Assurance Body for review and acceptance.

As a manufacturer is automatically in-scope, Ace Computers determined that they had achieved and maintained certification by a third-party accredited certification body to ISO 45001 to meet EPEAT Conformance under 4.10.1.2.

OHS

	In-Scope					Deter- mined Out-of- scope
Number of Facilities Audited	1 USA (Illinois)					3 USA (California)
	Aggregate number of nonconformities = 0					NA
	Aggregate number of repeat nonconformities = 0					NA
	Total percentage of nonconformities = 0%					NA
	Total percentage of repeat nonconformities = 0%					NA
<i>ISO 45001 Nonconformities:</i>	Aggregate number of non-conformities	Aggregate number of repeat non-Conformities	Total percentage of non-conformities	Total percentage of repeat non-conformities	Percentage of completion of corrective action for each OHS provision	NA
A) OHS management system describing context of the organization.	0	0	0%	0%	100% (No corrective actions in this round.)	NA
B) Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities, and Authorities.	0	0	0%	0%	100% (No corrective actions in this round.)	NA
C) Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them	0	0	0%	0%	100% (No corrective actions in this round.)	NA
D) Provision of resources competence and awareness, information, and communication and documented information.	0	0	0%	0%	100% (No corrective actions in this round.)	NA
E) Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.	0	0	0%	0%	100% (No corrective actions in this round.)	NA
F) Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review.	0	0	0%	0%	100% (No corrective actions in this round.)	NA
G) Incidents, nonconformities and corrective action, continual improvement of objectives and processes.	0	0	0%	0%	100% (No corrective actions in this round.)	NA

I: List of Related Documents

[ACE150 Supplier Code of Conduct 10/23/23](#)

4.10.1.2 Socially Responsible Supplier Manufacturing OHS Prioritization Spreadsheet

[Facility Self-Assessment Form](#)

II: Sources of Information

EEE Std 1680.1a-2020. IEEE Standard for Environmental and Social Responsibility Assessment of Computers and Displays.
Amendment 1: Editorial and Technical Corrections and Clarifications

[IT Services Company Solutions | Ace Computers](#)

III: Whom to contact

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